

SUPPRESSED

MAR 16 2016

**U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS**

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTOPHER LEE,

Defendant.

4:16CR120 RLW/NCC

INDICTMENT

COUNT ONE

(Bank Fraud)

The Grand Jury charges that:

A. At all times relevant to the indictment, Bank of America and Regions Bank had assets insured by the Federal Deposit Insurance Corporation.

B. The Scheme to Defraud

1. Between on or about October 8, 2015 and October 17, 2015, within the Eastern District of Missouri and elsewhere, the defendant,

CHRISTOPHER LEE,

devised a scheme and artifice to obtain moneys, funds, and assets owned by and under the custody and control of federally insured financial institutions by means of false and fraudulent pretenses and representations.

2. The scheme and artifice to defraud was in substance as follows:

- a. It was part of the scheme and artifice to defraud that defendant opened a checking account at a branch of Bank of America located within the Eastern District of Missouri.
- b. It was further part of the scheme and artifice to defraud that defendant gave the bank representative an initial deposit of \$841.26 in the form of a check drafted on a Regions Bank account that had been closed on December 9, 2014.
- c. It was further part of the scheme and artifice to defraud that defendant induced Bank of America to issue checks which would allow him to conduct financial transactions.
- d. It was further part of the scheme and artifice to defraud that defendant passed a check drawn on the account in the amount of \$1,800.00.

3. On or about October 17, 2015, in the Eastern District of Missouri, the defendant,

CHRISTOPHER LEE,

executed and attempted to execute the scheme and artifice as set forth above, in that he passed check number 100 drawn on a Bank of America account in the amount of \$1,800.00 to a third party after opening the checking account with a check drawn on a closed bank account of Regions Bank.

In violation of Title 18, United States Code, Section 1344.

COUNT TWO

(Aggravated Identity Theft)

The Grand Jury further charges that:

On or about November 9, 2015, within the Eastern District of Missouri, the defendant,

CHRISTOPHER LEE,

did knowingly possess, transfer, and use, without lawful authority, a means of identification of another person, to wit, the name of J.C. and the account number associated with convenience check number 1397, during and in relation to the commission of the felony offenses of: bank fraud, Title 18, United States Code, Section 1344; possession of stolen mail, Title 18, United States Code, Section 1708; and, access device fraud, Title 18, United States Code, Section 1029(a)(2).

In violation of Title 18, United States Code, Sections 1028A and 2.

COUNT THREE

(Aggravated Identity Theft)

The Grand Jury further charges that:

On or about November 9, 2015, within the Eastern District of Missouri, the defendant,

CHRISTOPHER LEE,

did knowingly possess, transfer, and use, without lawful authority, a means of identification of another person, to wit, the name of J.C. and the account number associated with convenience check number 1398, during and in relation to the commission of the felony offenses of: bank fraud, Title 18, United States Code, Section 1344; possession of stolen mail, Title 18, United

States Code, Section 1708; and, access device fraud, Title 18, United States Code, Section 1029(a)(2).

In violation of Title 18, United States Code, Sections 1028A and 2.

COUNT FOUR

(Aggravated Identity Theft)

The Grand Jury further charges that:

On or about December 12, 2015, within the Eastern District of Missouri, the defendant,

CHRISTOPHER LEE,

did knowingly possess, transfer, and use, without lawful authority, a means of identification of another person, to wit, the name of J.C. and the account number associated with convenience check number 1399, during and in relation to the commission of the felony offenses of: bank fraud, Title 18, United States Code, Section 1344; possession of stolen mail, Title 18, United States Code, Section 1708; and, access device fraud, Title 18, United States Code, Section 1029(a)(2).

In violation of Title 18, United States Code, Sections 1028A and 2.

A TRUE BILL.

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

TRACY LYNN BERRY - 014753 TN
Assistant United States Attorney